

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IRON WORKERS' MID-AMERICA	)	
PENSION PLAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 12 C 9374
	)	
ALL AMERICAN INSTALLATIONS,	)	JUDGE HARRY D. LEINENWEBER
INC., an Illinois corporation, and	)	
WILLIAM KRYGSHELD, II, personally,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, ALL AMERICAN INSTALLATIONS, INC., an Illinois corporation, in the total amount of \$4,285.79, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,716.00.

On November 29, 2012, the Summons and Complaint was personally served on the corporation's president, William Krygsheld, II at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on December 20, 2013. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 2nd day of July 2013:

Mr. William Krygsheld, II, President  
All American Installations, Inc.  
3263 W. Indiana Avenue  
Beecher, IL 60401

/s/ Patrick N. Ryan

Patrick N. Ryan  
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